

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KRZYSZTOF KOPERSKI and LISA D.
KOPERSKI, a married couple,

Plaintiffs,

v.

ABBOTT LABORATORIES, INC., a
corporation; ABBOTT PRODUCTS, INC., a
corporation; SOLVAY S.A., a company;
SOLVAY AMERICA, INC., a corporation;
and UNIMED PHARMACEUTICALS,
LLC., a limited liability corporation,

Defendants.

No. 2:13-cv-00109-JCC

**STIPULATION AND PROPOSED
ORDER OF DISMISSAL**

STIPULATION

Plaintiffs Krzysztof and Lisa D. Koperski (together, "the Koperskis") and Defendants Solvay S.A. and Solvay America, Inc. (the "Defendants"), stipulate to dismissal with prejudice of the Koperskis' claims against Solvay North America, Inc. and Solvay S.A. that were brought or could have been brought in this action. The Koperskis, Solvay North America, Inc., and Solvay S.A. further stipulate that the Court should enter the following order of dismissal.

In the event that the Court declines to enter proposed order of dismissal, the parties to this Stipulation agree that entering into this Stipulation does not constitute submission by the

1 Defendants to the jurisdiction of this Court and, except as expressly set forth herein, the parties
2 to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation
3 shall not impair or otherwise affect such rights and defenses, including to challenge the
4 jurisdiction of the Court in this Court or any other court.
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1 DATED: March ²¹ 2013.

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LLC., a limited liability corporation,

Defendants.

No. 2:13-cv-00109-JCC

[PROPOSED] ORDER

This matter comes before the Court on the stipulation and proposed order of dismissal filed by Plaintiffs Krzysztof and Lisa D. Koperski (together, “the Koperskis”) and Defendants Solvay North America, Inc. and Solvay S.A. The Court hereby ORDERS that the Koperskis’ claims against Solvay North America, Inc. and Solvay S.A. that were brought or could have been brought in this matter are dismissed with prejudice.

DATED this ___ day of March 2013.

John C. Coughenour
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2013, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following participants:

- **Timothy P Harkness**
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I further certify that on March 29, 2013 I caused a true and correct copy of the **Stipulation and Proposed Order of Dismissal** to be served on Pro Se Plaintiffs by email and by depositing the same in the U.S. Mail, postage prepaid, addressed as follows:

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Dated: March 29, 2013.

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